

# **Exhibit D**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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FULL CIRCLE UNITED, LLC,

Plaintiff,

vs.

Case No.

1:20-cv-03395

BAY TEK ENTERTAINMENT, INC,

Defendant.

CONFIDENTIAL

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BAY TEK ENTERTAINMENT, INC.,  
Counterclaim Plaintiff,

vs.

FULL CIRCLE UNITED, LLC,  
Counterclaim Defendant,

and

ERIC PAVONY,  
Additional Counterclaim  
Defendant.

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CONFIDENTIAL

VIRTUAL VIDEO-RECORDED DEPOSITION OF:  
LARRY TREANKLER

TAKEN AT: The Witness's Residence

LOCATED AT: 6747 Kawula Lane  
Sobieski, Wisconsin  
July 12, 2022  
9:24 a.m. to 7:12 p.m.

REPORTED BY: VICKY L. ST. GEORGE, RMR.

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JOB NO. 5304329

1 Q. Did you -- did anyone at Bay Tek to your knowledge  
2 tell Full Circle why Bay Tek was pausing its efforts?

3 MS. LEPERA: Objection to form.

4 THE WITNESS: Yes.

5 BY MS. CASADONTE-ASPSTOLOU:

6 Q. And what was the reason for the pause Bay Tek  
7 communicated to Full Circle?

8 A. Can you repeat the question?

9 Q. Did Bay Tek communicate -- what was the reason to  
10 communicate to Full Circle for the pause?

11 A. We had asked them if we could do a nonrevenue  
12 generating tournament for the football team that we  
13 own, and they wanted to do a contract to do that.  
14 And after we had made them 10 lanes and stopped  
15 everything that we were doing to pull that off for  
16 them, take my people off of other projects and do it  
17 all hands on deck effort to produce those things for  
18 them, that really irritated us. And then we found  
19 out that they were recording us, and that was  
20 double -- that was double irritating.

21 Q. Do you know what resources Bay Tek invested in  
22 manufacturing the 10 custom lanes for Full Circle?

23 A. Sure.

24 MS. LEPERA: Object to the form. Go  
25 ahead.

1 MS. LEPERA: I want to put on the record  
2 my objection to the form to the extent it implies or  
3 assumes any obligation to continue. Subject to  
4 that, you may answer.

5 COURT REPORTER: I'd like you to repeat  
6 the question because it was interrupted.

7 BY MS. CASADONTE-ASPSTOLOU:

8 Q. When did Bay Tek -- did Bay Tek ever make a decision  
9 prior to this litigation to stop manufacturing NSBL  
10 lanes for Full Circle?

11 MS. LEPERA: My objection is that it  
12 assumes facts not in evidence, i.e., an obligation  
13 to continue. Subject to that, you can answer.

14 THE WITNESS: I don't know that we  
15 specifically said we are not going to continue or  
16 that we're going to stop. That became apparent by  
17 the way the relationship was going.

18 BY MS. CASADONTE-ASPSTOLOU:

19 Q. What do you mean by the way the relationship was  
20 going?

21 A. It just was not going well.

22 Q. Do you recall when the relationship between Bay Tek  
23 and Full Circle in Bay Tek's opinion stopped going  
24 well?

25 A. Well, I gave you the two instances that were

1 material. Prior to that most of our angst was how  
2 pushy they were, how aggressive they were and how it  
3 was pretty much everything was on our dime, on our  
4 nickel.

5 Q. Did you at any time prior to the manufacture of the  
6 NSBL lanes for Full Circle tell Full Circle that Full  
7 Circle could stop trying to raise money from third  
8 parties to manufacture the NSBL lanes?

9 MS. LEPERA: Objection, form of the  
10 question.

11 THE WITNESS: That they could stop trying  
12 to raise money?

13 BY MS. CASADONTE-ASPSTOLOU:

14 Q. Yes.

15 A. No, not to my knowledge.

16 Q. Did you ever tell Full Circle prior to the delivery  
17 of the NSBL lanes to Full Circle that Bay Tek wanted  
18 to invest in the manufacture of the NSBL lanes?

19 MS. LEPERA: Objection to the form of the  
20 question, vague and ambiguous, assumes facts not in  
21 evidence. You can answer if you understand.

22 THE WITNESS: I don't understand it. In  
23 the cost of manufacture or -- I'm confused.

24 BY MS. CASADONTE-ASPSTOLOU:

25 Q. Okay. Did you ever tell Full Circle at any time that